

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN GRANGER,

Plaintiff,

- against -

GILL ABSTRACT CORPORATION and NAN
GILL,

Defendants.

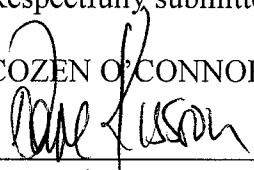
Civ. Action No. 07-CV-3491(PKC)

NOTICE OF CROSS MOTION

Pursuant to Federal Rules of Civil Procedure 54 and 56, defendants Gill Abstract Corporation and Nan Gill ("Defendants") move to strike plaintiff John Granger's ("Granger") Third Motion for Summary Judgment and accompanying papers in their entirety with prejudice. The Defendants cross move for summary judgment dismissing Plaintiff's claims for damages in their entirety. The Defendants additionally move, pursuant to Federal Rules of Civil Procedure 54(d)(2) and 56(g), for payment of their reasonable expenses, including attorneys' fees, associated with their preparation of this motion. The Defendants incorporate the attached memorandum of law, the affidavits of Nan Gill, Drew Diskin and Sal Cimaglia and the exhibits attached thereto, and all other papers, caselaw and pleadings before this court.

Dated: October 19, 2007

Respectfully submitted by:


COZEN O'CONNOR

Dave Kissoon
909 Third Avenue
New York, NY 10022
Telephone: 212.453.3829
Facsimile: 866.755.6386